

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JAN 29 2015

David J. Bradley, Clerk

United States of America )  
v. )  
Juan CRUZ )  
YOB: 1977 Citizenship: United States )

Case No. M-15-0113-MDefendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 28, 2015 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

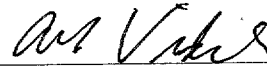
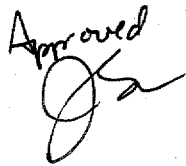
18 U.S.C. § 1028(a)(3) &amp; (b)(1)(B)

Knowingly possessed with intent to use unlawfully or transfer unlawfully five or more false identification documents.

This criminal complaint is based on these facts:

On January 28, 2015, an undercover (UC) Homeland Security Investigations (HSI), Harlingen, Texas, Agent met with Juan CRUZ in the McAllen, Texas area. CRUZ sold four sets of fraudulent documents to the HSI UC. Each set of documents consisted of one fraudulent legal permanent resident card, one fraudulent social security card, and one fraudulent Texas identification card. During an interview, CRUZ admitted he was to be paid \$800 for all four sets.

Continued on the attached sheet.

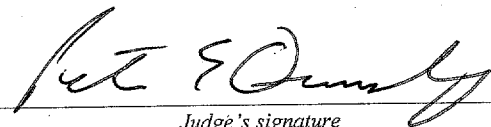
Approved  


Complainant's signature

Alfredo Vidales, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/29/20158:12 a.m.

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter E. Ormsby

Printed name and title